LOWER WILLAMETTE GROUP

Co-Chairperson: Jim McKenna, Port of Portland
Co-Chairperson: Bob Wyatt, NW Natural
Treasurer: Fred Wolf, Legacy Site Services for Arkema

April 16, 2008

Chip Humphrey
Eric Blischke
U.S. Environmental Protection Agency, Region 10
811 SW 6th Avenue, 3rd Floor
Portland, OR 97204

Re: Lower Willamette River, Portland Harbor Superfund Site
USEPA Docket No: CERCLA-10-2001-0240
Portland Harbor

Dear Chip and Eric:

On December 12, 2007, the Lower Willamette Group ("LWG") sent a letter to the U.S. Environmental Protection Agency ("EPA") and the Portland Harbor Natural Resource Trustee Council ("Trustees") outlining the LWG's additional efforts to assess risk to lamprey in the Portland Harbor.

As a part of that work, the LWG proposed a literature review for evidence of differences in the mechanisms of toxicity from water versus dietary exposure of fish to organic chemicals. The LWG has received a copy of the Trustee's letter to EPA dated January 25, 2008 in which the Trustees requested that the LWG expand this proposed literature review. Specifically, the Trustees requested that the LWG expand the review to consider the following:

- Dietary toxicity of metals and metalloids, as well as organic materials;
- Dietary toxicity to invertebrates, rather than just fish;
- Differences in exposure mechanisms and concentrations from sediment exposure, rather than focusing solely on the issues and differences in mechanisms of toxicity;
- How the specific physiology of lamprey (*e.g.*, induction of detoxification enzymes) could influence potential toxicity to contaminants; and
- Identifying all reports and other information in laboratory procedures using ammocoetes and sediments involving rearing, stress testing, and responses of ammocoetes to any chemical exposures.

The LWG has considered the Trustees' request and, recognizing the importance of lamprey to the Trustees, agrees to expand the literature review to include the first four elements. It will look

at dietary toxicity of metals and metalloids and dietary toxicity to invertebrates. The LWG will also review the literature on the relative importance of ingestion, dermal, and respiratory exposure routes for all the benthic and epibenthic receptors in the Baseline Ecological Risk Assessment and the mechanisms of lampricide toxicity, which include how the physiology of lamprey influences the species' sensitivity to toxicants.

Since receiving the Trustee's request, the LWG has learned that the Trustees have separately proposed that a larger group of parties fund a pilot laboratory study to evaluate sediment toxicity to lamprey in the context of the natural resource damages assessment. It appears that the proposed pilot study will likely include the work described in the Trustee's request to identify all reports and other information in laboratory procedures involving rearing, stress testing, and responses of ammocoetes to chemical exposures. Therefore, the LWG would not plan for its expanded literature review to include this element of the Trustee's request.

We hope this additional work will be helpful. Please let us know if you or your partners have any questions.

Sincerely,

Jim McKenna, LWG Co-Chair Bob Wyatt, LWG Co-Chair

cc: William K. Barquin, Chairman Trustee Council
Patty Howard, CRITFC
Brian Cunninghame, Confederate Tribes of Warm Springs
Rose Longoria, Confederated Tribes of Yakama Nation
Sheila Fleming, Ridolfi Inc, for Yakama Nation
Jeff Baker, Confederated Tribes of Grande Ronde
Lisa Bluelake, Confederated Tribes of Grande Ronde
Tom Downey, Confederated Tribes of Siletz
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Stratus Consulting
LWG Legal
LWG Repository